

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

THE ESTATE OF TONYA K. MEALMAN
BY SPECIAL ADMINISTRATOR
ARIC D. BURCH,

Plaintiff,

Case No. 21-CV-820

v.

WISCONSIN MUNICIPAL MUTUAL
INSURANCE COMPANY, et al.,

Defendants.

**PLAINTIFF'S EIGHTH MOTION TO COMPEL WELLPATH DEFENDANTS TO
PRODUCE FINANCIAL INFORMATION**

Plaintiff moves this Court for an order compelling the Wellpath Defendants to produce documents responsive to Plaintiff's Ninth Set of Requests for Production of Documents Nos. 5 and 6, award attorneys' fees and costs, and further sanction Wellpath for its continued dilatory and vexatious conduct. FED. R. CIV. PRO. 37(a). Plaintiff is specifically requesting the Court order Wellpath to produce:

- Wellpath, CCS and CHC tax returns along with complete GAAP-compliant audited financial statements from 2021-2022;
- And because Wellpath's Controller and Senior Vice President, Tabitha Vanns has testified that CCS-CMGC Intermediate Holdings, Inc. is the entity holding consolidated financial information for Wellpath LLC, which is a Variable Interest Entity of CCS-CMGC Intermediate Holdings, Inc.,

the tax returns along with complete GAAP-compliant audited financial statements of CCS-CMGC Intermediate Holdings, Inc. from 2021-2022.

Plaintiff submits a contemporaneously filed brief and declaration of John H. Bradley in support of this motion.

Respectfully submitted,

Dated: 13 March 2024

/s/ John H. Bradley
John H. Bradley
Wisconsin Bar No. 1053124
R. Rick Resch
Wisconsin Bar No. 1117722
STRANG BRADLEY, LLC
613 Williamson Street, Suite 204
Madison, Wisconsin 53703
(608) 535-1550
John@StrangBradley.com
Rick@StrangBradley.com

Attorneys for Plaintiff

I CERTIFY I have in good faith conferred and attempted to confer with opposing counsel pursuant to Civil L. R. 37 in an effort to obtain the Wellpath Defendants responses to Plaintiff's above discovery requests without court action, but the parties are unable to reach an accord.

/s/ John H. Bradley